

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE

AT CHATTANOOGA

MATTHEW E. WATSON III

Name of plaintiff (s)

v.

Verizon Wireless

Name of defendant (s)

Case No. 1:12-cv-71  
(to be assigned by Clerk)

Matthew Lee

COMPLAINT

1. A short and plain statement of the grounds for filing this case in federal court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

2. Plaintiff, \_\_\_\_\_ resides at

1795 Southernwood Dr. Apt. 13 Chattanooga  
street address city

Hamilton TN 37421 (423) 619-5738  
county state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

3. Defendant, Verizon Wireless lives at, or its business is located at

2000 Gunbarrel Road, Chattanooga,  
street address city  
Hamilton, TN, 37421  
county state zip code

(if more than one defendant, provide the same information for each defendant below)

4. Short and plain statement of your claim (state as briefly as possible the facts of your case and how each defendant is involved. You may use additional paper if necessary):

I'm filing my lawsuit claiming discrimination under Title VII  
And Americans with disabilities Act. I'm an African American  
who was employed at Verizon Wireless as a Retail Sales Associate.  
I was terminated on Feb. 10, 2009 for failure to meet or exceed  
my monthly sales quota (Stage 3). Initially, I was told by my store  
manager, Brad Posey that I was on Stage 4. At the time of my  
termination, there was a Caucasian sales rep named Craig Smith who  
was also on Stage 3. Craig Smith was not terminated and is still  
employed by Verizon Wireless. It was always communicated by  
company management to me, that one couldn't be terminated  
for failure to meet quota unless they were on Stage 4.

Cont.

I have a permanent partial disability to my lower left leg & foot which requires an accommodation of sitting as necessary during the work day. Verizon Wireless accommodated the above at first, but later revoked the accommodation upon management change. I was told by store management that I couldn't do the job with my Disability.

5. A demand for judgment for the relief you seek (list what you want the Court to do):

- a. Back pay plus bonuses
- b. front pay
- c. Name removed from the Do not hire list.
- d. Compensation for embarrassment & mental Anguish.

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this MARCH day of 05, 20 12.



Signature of plaintiff (s)